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6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

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10 )  
11 ) 02:06-cv-81-RCJ(PAL)  
12 ) **COMPLAINT**  
13 ) In Violation Of: 18 United States  
14 ) Code § 3184 - Fugitive from  
Foreign Country to United States

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16 I, the undersigned Assistant United States Attorney, being duly sworn, state on  
17 information and belief that the following is true and correct:

- 18 1. In this matter I act for and on behalf of the Government of the Republic of Korea;  
19 2. There is an extradition treaty in force between the United States and the Republic of  
20 Korea, which was entered into force on December 20, 1999, a copy of which is included in  
21 Government's Exhibit #1;  
22 3. Pursuant to the treaty, the Government of Korea has submitted a formal request  
23 through diplomatic channels for the extradition of In Kyu Chang;  
24 4. In Kyu Chang was charged with fraud, in violation of Article 3, paragraph 1 of the Act  
25 on Aggravated Punishment, etc., of Specific Crimes (Fraud), and Article 347, paragraph 1 of the  
26 Criminal Act, committed in the jurisdiction of the requesting state and warrants for his arrest were

1 issued on January 20, 2004, by Ji Soo Choi, Judge of Seoul District Court, at Seoul, Korea, and on  
2 December 28, 2005, by Kyung Sim, Judge of Seoul Central District Court, at Seoul, Korea (with  
3 extended period of validity).

4 5. The warrants were issued on the basis of the following facts:

5 The suspect, actual founder and manager of Haechang Steel Industry  
6 Co. (hereinafter, Haechang Industry), when the company faced  
7 financial difficulties, decided to defraud money from a lease company,  
8 which lent funds for leasing machinery, by having the suppliers of  
9 machinery pretend to provide its user, the above company, with  
10 machinery, and apply for payment to the lease company for the  
11 machinery. Then the suspect conspired with In Gu Park, managing  
director of Haechang Industry, (sentenced to imprisonment of one year  
and a half on July 25, 2002. and later fixed on October 1.) and Yong  
Ok Choi, owner of Kumsung Electric Industry (sentenced to  
imprisonment of two years and suspension of its execution for 3 years  
on December 26, 1997 and later fixed on January 4, 1998) and  
committed the following:

12 Haechang Industry had actually bought and installed second-  
13 hand machinery worth 242,000,000 won from Korea Aluminum and  
14 had never been provided with machinery worth 2 billion won by Yong  
15 Jin Choi, Yong Ok Choi, and Chul Wu Choi. However, in early June  
16 of 1996, at the office of Shinhan Capitol Co Ltd. (hereinafter 'victim  
17 company') located at 526-3, Gojan-dong, Ansan-city, the suspects  
18 submitted false estimation sheets and other documents which indicated  
19 that Yong Jin Choi, Yong Ok Choi, and Chul Wu Choi would provide  
Haechang Industry with the aluminum extrusion machinery worth  
2,000,000,000 won, and made Shinhan Capitol, which believed the  
documents were true, remit as payment for the parts of the machinery  
55,000,000 won and 1,210,000,000 won to Chul Wu Choi and Yong  
Jin Choi respectively on June 10 and 735,000,000 won to Yong Ok  
Choi on June 20. Thus the suspects defrauded 2,000,000,000 won in  
total.

20 6. In Kyu Chang is a male citizen of the Republic of Korea, born March 8, 1952. He has  
21 black hair, dark brown eyes, and height of approximately 177cm. He was issued Korean passport No.  
22 JR0224697. It is believed that In Kyu Chang may be found residing within the jurisdiction of this  
23 court at 10609 Meadow Mist Avenue, Las Vegas, Nevada.

24 7. Virginia P. Prugh, an Attorney-Adviser in the Office of the Legal Adviser, of the  
25 United States Department of State, has provided the Department of Justice with a declaration  
26 authenticating a copy of the diplomatic note by which the request for extradition was made and a copy

1 of the extradition treaty between the United States and the Republic of Korea, stating that the offenses  
2 for which the extradition is demanded are covered by the treaty, and confirming that the documents  
3 supporting the request for extradition are properly certified by the principal American Diplomatic or  
4 consular officer in Korea, in accordance with Title 18, United States Code, Section 3190, so as to  
5 enable them to be received in evidence; and

6 8. The declaration from the Department of State with its attachments, including a copy  
7 of the diplomatic note from the requesting state, a copy of the relevant extradition treaty, and the  
8 certified documents submitted in support of the request, [marked collectively as Government's Exhibit  
9 #1] are filed with this complaint and incorporated by reference herein.

10 WHEREFORE, the undersigned requests that a warrant for the arrest of the forenamed  
11 person be issued in accordance with the Extradition Treaty between the United States and the Republic  
12 of Korea, and Title 18, United States Code, Section 3184, so that the fugitive may be arrested and  
13 brought before this court, "to the end that the evidence of criminality may be heard and considered."

14  
15 /S/ CAMILLE W. DAMM  
16 CAMILLE W. DAMM  
17 Assistant United States Attorney

18 Sworn to before me and subscribed in my presence this \_\_\_\_ day of January 2006, at Las Vegas,  
19 Nevada.

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22 UNITED STATES MAGISTRATE JUDGE  
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